

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:  
GEO EXPLORATION, LLC.,

Debtor.

Case No. 09-14024 *BA* OCT 26 P 14:02  
Chapter 7

**MOTION FOR RULE  
2004 EXAMINATION**

*54*

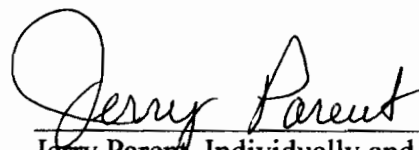
Jerry Parent ('Parent'), an unlisted creditor of the debtor, files this motion for a Rule 2004 examination of Kris K. Agrawal ('Agrawal'), 4133 N. Lincoln Blvd., Okla. City, OK 73105, and in support states:

1. The above referenced Debtor filed a Voluntary Petition under Chapter 7 of the United States Bankruptcy Code on July 27, 2009.
2. Parent is also Managing Member of Spoon Resources, LLC. ('Spoon'), which has a judgment against Debtor and Agrawal and other entities related to Debtor and to Agrawal in CJ-08-1209, Okmulgee County District Court, Oklahoma, which judgment filed April 3, 2009, declared that the Debtor and Agrawal "acting in concert and conspiracy, knowingly and willfully filed a false lien notice and disparaged Spoon's title in the Lease", referring to the subject Wilson oil and gas lease. Agrawal neglected to list Spoon or Parent as creditors in this matter.
3. Agrawal as the corporate representative of Debtor appeared at the §341 hearing on August 25, 2009, but was uncooperative with the assigned Trustee, Win Holbrook, and was ordered to appear at a continuance on Wednesday, October 21, 2009, at 0900 but failed to appear greatly inconveniencing the Trustee, Parent and several other creditors who had driven from as far away as the Oklahoma panhandle. Trustee Holbrook supports this motion for a Rule 2004 hearing.
4. Debtor and Agrawal should also produce the following relevant documents:
  - a. All documents previously requested by Trustee Holbrook and U.S. Attorney Glidewell at the first §341 hearing as specifically stated in the official recording thereof, said documents to be delivered at the continuance on October 21, 2009, which Debtor and Agrawal contemptuously failed, neglected and refused to attend, and,
  - b. All documents tending to support debtor's claims against Spoon

Resources, LLC. in general and debtor's lien notice in particular filed in Book 1963 at Page 255 with the County Clerk of Okmulgee County, Oklahoma.

5. Rule 2004 of the Federal Rules of Bankruptcy Procedure provides, *inter alia*, that, on motion, the court may order the examination of any person, and the person may be compelled to produce documents.

WHEREFORE, Jerry Parent, Creditor, for himself and for Spoon, requests the Court issue its order directing Kris Agrawal to attend a Rule 2004 examination at 1000 A.M., on November 23, 2009, in the offices of Delluomo and Crow at 5617 N. Classen Blvd., Okla. City, OK 73118 and produce the documents above requested.



Jerry Parent, Individually and as  
Managing Member of Spoon.  
102 W. Polk St.  
McAlester, OK 74501  
Ph: 405.474.7455

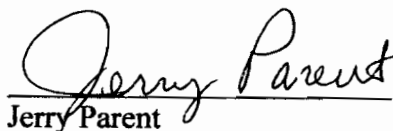
### **CERTIFICATE OF SERVICE**

I hereby certify that on October 26<sup>th</sup>, 2009, a copy of this Motion was served via first class mail, postage prepaid, to:

Geo Exploration, LLC  
Kris Agrawal  
4133 N. Lincoln Blvd  
Okla. City, OK 73105

Win Holbrook, Esq.  
100 N. Broadway, Suite 3300  
Okla. City, OK 73102

All others on the case mailing matrix as  
required. *VIA U.S. MAIL*

  
Jerry Parent

Jason Cox  
P.O.B. 171  
Newcastle, OK 73065-0171

Jason Green  
912 S. Taft Street  
Tulsa, OK 74147

John Lewis Well Service  
P.O.B. 67  
Saskva, OK 74867-0067

Josh Davis  
35986 E. hwy 270  
Seminole, OK 74868-6908

Justin Holland  
3513 Oak Cliff Drive  
Oklahoma City, OK 73135-1319

Kris Agrawal  
4133 N. Lincoln Blvd.  
Oklahoma City, OK 73105-5208

LJWS Rental Tool & Trucking  
P.O.B. 1025  
Parryton, TX 79070-1025

Lively Electric  
Hwy 270B W  
Newoka, OK 74884

Mike Walker  
3400 S.E. 27th Street  
Del City, OK 73115-1618

Mills Well Service  
P.O.B. 871  
Seminole, OK 74818-0871

Nichols Water Services  
c/o Jerry Venables  
P.O.B. 340  
Beaver, OK 73932-0340

O.K. Cementing  
c/o James Neal  
P.O.B. 1628  
Ada, OK 74821-1628

OG&E  
Box 24990  
Oklahoma City, OK 73124-0990

Oklahoma Corporation Commission  
2101 N. Lincoln Blvd.  
Oklahoma City, OK 73105-4993

Perkins Petroleum  
P.O.B. 1078  
Guyman, OK 73942-1078

Rawhide Well Service  
P.O.B. 1988  
Cody, WY 82414-1988

Ray Vincent  
430 N.W. 11th Street  
Oklahoma City, OK 73103-3914

Ricardo Polio  
3485 East 41st  
Oklahoma City, OK 73129

Sulphur Well Services  
3838 Oak Lawn Ave.  
Ste. 910  
Dallas, TX 75219-4510

Victor Grider  
701 N.W. 13th Street  
Oklahoma City, OK 73103-2206

David M. Roberts  
Affiliated Legal Services, Inc.  
4200 Perimeter Center, Suite 245  
Oklahoma City, OK 73112-2322

Herbert M. Graves  
United States Trustee  
215 Dean A. McGee Ave., 4th Floor  
Oklahoma City, OK 73102-3440

L. Win Holbrook  
Andrews Davis  
100 North Broadway Suite 3300  
Oklahoma City, OK 73102-8812

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)J & L Cementing Service  
c/o John Coffey  
1001 N.W. 63rd Street

End of Label Matrix  
Mailable recipients 52  
Bypassed recipients 1  
Total 53

Label Matrix for local noticing  
1087-5  
Case 09-14024  
Western District of Oklahoma  
Oklahoma City  
Fri Sep 18 15:07:48 CDT 2009

USBC Western District of Oklahoma  
215 Dean A. McGee  
Oklahoma City, OK 73102-3440

Geo Exploration, LLC.  
4133 N. Lincoln Blvd.  
Oklahoma City, OK 73105-5208

A & J Acid Inc.  
P.O.B. 758  
Blackwell, OK 74631-0758

Great White Pressure Pumping, LLC  
4500 S.E. 59th Street  
Oklahoma City, OK 73135-3326

Bill Henson Pulling Unit  
8931 South Erie  
Tulsa, OK 74137-3546

Blowout Tools  
P.O.B. 96058  
Oklahoma City, OK 73143-6058

Bostic Services  
P.O.B. 536  
Crescent, OK 73028-0536

Burleson Pump Company  
21207 S. Prospect  
Oklahoma City, OK 73129

CF Supply LLC  
P.O.B. 1385  
Liberal, KS 67905-1385

Case Wire Line  
P.O.B. 646  
Woodward, OK 73802-0646

Christopher Holland  
8810 N. Henley  
Oklahoma City, OK 73131-4006

City of Oklahoma City  
P.O.B. 26570  
Oklahoma City, OK 73126-0570

DCP Minerals  
6120 S. Yale, Ste. 1100  
Tulsa, OK 74136-4200

DJF Services, Inc.  
P.O.B. 150  
Holdenville, OK 74848-0150

Dustin Pannell  
C/O Oklahoma Depart of Labor Legal Divis  
3017 N. Stiles  
Oklahoma City, OK 73105-2811

Eagle Well Service  
d/b/a Bronco Energy Services  
6601 S.W. 29th Street  
Oklahoma City, OK 73179-6004

F & F Tool Company  
c/o Michael Bigheart  
202 W. Broadway  
Enid, OK 73701-4048

Fesco, Ltd  
c/o Susan Meinders  
2201 S. Main Street  
Hope, AR 71801

Foster Testing Co.  
P.O.B. 728  
Perryton, TX 79070-0728

General Holdind Corporation  
4133 N. Lincoln Blvd.  
Oklahoma City, OK 73105-5208

General, Inc.  
P.O.B. 504  
Laverne, OK 73848-0504

Gilbert Ventura  
348 S.E. 44th Street  
Oklahoma City, OK 73129

Gore Nitrogen  
P.O.B. 65  
Seiling, OK 73663-0065

Harris Engine & Compressor Service  
P.O.B. 2616  
Liberal, KS 67905-2616

Hough Oil Field Service  
P.O.B. 1603  
Cushing, OK 74023-1603

Israel Harrison  
35986 E. HWY 270  
Seminole, OK 74868-6908

J & R Service  
P.O.B. 781  
Woodward, OK 73802-0781

JACAM Chemicals LLC  
205 S. Broadway  
Sterling, KS 67579-2339

Jack's Flex Pipe  
P.O.B. 71  
Konawa, OK 74849-0071